



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

March 29, 1993

Mr. Mark Terril
PPG Industries, Inc.
P.O. Box 2009
Allison Park, Pennsylvania 15101

Re: Walton's Farm Site, Administrative Order #II-CERCLA-20101

Dear Mark:

This letter serves as EPA's response to the Verification Plan for the Stockpile and Support Areas submitted by IT Corporation on March 22, 1993. Revisions in accordance with the following comments must be incorporated into the Final Verification Plan, which must be approved by EPA prior to IT initiating verification activities. EPA's comments are as follows:

- OK? o Calculations for determining a representative number of samples to be collected in the stockpile area are inadequate and unacceptable to EPA. The statistical determinations are based upon assumptions about prior site conditions; thus the analytical results utilized do not provide a representative baseline of the current situation. In order to address these concerns, a preliminary round of biased samples must be collected for determining an appropriate number of random samples.
- OK o Unlike the support area, the stockpile area is relatively small and has greatly impacted the underlying soils. In order to overlay the stockpile area with a sufficient number of grid nodes, a smaller grid system must be used.
- o IT's preparedness to collect "a" biased sample is unacceptable to EPA. In order to confirm that PPG has met its obligations under the ACO, EPA must have the option to ensure that all areas of the site have been adequately addressed. EPA will not limit itself to the number of biased or judgemental samples it deems necessary. Allowing for collection of biased samples will ensure attainment of cleanup standards in all areas.
- OK o The reference to quality assurance samples for repeated verification sampling rounds requires elaboration and/or justification prior to EPA's approval.

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- OK o When removing the prescribed radius of soil around a hot spot, samples must be collected to verify attainment of the cleanup standard.

Another matter to be addressed by PPG has recently been brought to my attention by EPA's Technical Assistance Team (TAT). It seems that the decontamination (decon) pad is full to capacity with rainwater and has evidently overflowed onto the surrounding ground. The subject liquids and soils, as well as a tank of decon water already stored on-site, will require additional sampling. This additional sampling will determine what disposal, if any, will be appropriate. Provisions for this issue may be included with the Final Verification Plan or may be addressed in a separate response.

Should you or any of the IT representatives have any questions regarding this letter please do not hesitate to contact me at (609) 794-1202 or (908) 321-4345.

Sincerely,



Donald R. Graham,
On-Scene Coordinator